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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS

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UNITED STATES OF AMERICA,

Plaintiff,

: No. 1:23-cv-00853-DAE

v.

GREG ABBOTT, in his capacity as

GOVERNOR OF THE STATE OF TEXAS,

and THE STATE OF TEXAS,

April /7, 2024

Defendants.

MOVANT'S MOTION FOR DECLARATORY JUDGMENT

The Movant, Robert A. Heghmann, hereby Moves for a Declaratory Judgment that Joseph Biden is GUILTY of committing a Crime against Humanity and Genocide between June, 2014 and the date hereof in the State of Texas and elsewhere. In support of this Motion, the Movant has filed the accompanying Memorandum of Law and Appendix.

Dated: April // ,2024

Robert A. Heghmann

P.O. Box 2108

Leander, Texas 78646

Bob Heghmann@Reagan.com

CERTIFICATION

The Movant hereby certifies that a copy of this Motion for Declaratory Judgment was served upon the counsel for the United States and the State of Texas by U.S. Mail, Postage-Prepaid on April /7, 2024 at the following addresses:

The United States

Andrew D. Knudsen Mary F. Kruger

U.S. Department of Justice U.S. Attorney's Office

P.O. Box 7611 601 NW Loop 410, Suite 600

Washington, D.C. 20044 San Antonio, TX 78216

State of Texas

Kyle Stephen Tebo Jacob Edward Przada

Office of the Attorney General Office the Attorney General

P.O. Box 12548 P.O. Box 12548

Austin, TX 78711-2548 Austin, TX 78711-2548

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